



Chairman Gary St. Vil

# TOWN OF LEDYARD

CONNECTICUT  
TOWN COUNCIL

MINUTES  
PUBLIC HEARING  
LEDYARD TOWN COUNCIL  
COUNCIL CHAMBERS - ANNEX BUILDING  
HYBRID FORMAT

**DRAFT**

PUBLIC HEARING MINUTES

5:00 PM; NOVEMBER 10, 2025

- I. CALL TO ORDER – Chairman St. Vil called to order the Public Hearing at 5:00 p.m. regarding a proposed “*An Ordinance Establishing a Town of Ledyard Code of Ethics And Ethics Commission*” as updated on or about October 29, 2025.

- II. PLEDGE OF ALLEGIANCE

- III. PROCEDURE OF THE PUBLIC HEARING

Chairman St. Vil welcomed all to the Hybrid Meeting. He stated for the members of the Town Council and the Public who were participating via video conference that the remote meeting information was available on the Agenda that was posted on the Town’s Website – Granicus-Legistar Meeting Portal.

Chairman St. Vil provided an overview of the procedure of the Public Hearing, and he asked those attending remotely to put their name and address in the “*Chat*” noting that they would be called upon during the Public Comment portion of tonight’s meeting.

- IV. CALL OF THE PUBLIC HEARING

The following call of the Public Hearing was read by Town Council Administrative Assistant Roxanne M. Maher:

## LEGAL NOTICE TOWN OF LEDYARD

### NOTICE OF PUBLIC HEARING

The Ledyard Town Council will conduct a Hybrid Format Public Hearing  
(In-Person & Video Conference)  
on Monday, November 10, 2025 at 5:00 p.m.  
to receive comments/recommendations regarding a Proposed

“*An Ordinance Establishing a Town of Ledyard Code of Ethics And Ethics Commission*”  
As updated on or about October 29, 2025

Please join the Public Hearing in-person or remotely as follows:

In-person attendance will be at the  
Council Chambers, Town Hall Annex Building  
741 Colonel Ledyard Highway, Ledyard, Connecticut

Please join the video conference meeting from your computer, tablet, or smartphone at:  
<https://us06web.zoom.us/j/launch/edl?muid=0ec0d0ed-c495-4aa5-adaa-ac97f88014e2>

Meeting ID: 872 3852 2319; Passcode: 298911

or by audio only dial: +1 646 558 8656 Meeting ID: 872 3852 2319; Passcode: 298911

At this hearing interested persons may appear and be heard and written communications will be accepted at [towncouncil@ledyardct.org](mailto:towncouncil@ledyardct.org).

Dated at Ledyard, Connecticut this 30th day of October, 2025.

For the Ledyard Town Council  
s/s Gary St. Vil, Chairman

Please Publish on Friday, October 31, 2025

V. PRESENTATIONS

Chairman St. Vil called upon Councilor Buhle to present the proposed “*An Ordinance Establishing a Town of Ledyard Code of Ethics And Ethics Commission*” as updated on or about October 29, 2025.

Councilor Buhle stated for those who have been following the Ethics Ordinance process that a new draft Ordinance has been presented which incorporated the feedback received on the previously proposed Ordinance at the September 24, 2025 Public Hearing, as well as feedback from the Town Attorney, interested stakeholders, along with the public feedback that was received earlier this evening during the Special Administration Committee meeting.

Councilor Buhle continued by explaining that based on Town Attorney Matt Ritter’s recommendation to start with an Ethics Ordinance from another town; they chose to use the Town of Glastonbury’s Ethics Ordinance as their starting point because Attorney Ritter helped to draft their Ethics Ordinance. She stated that they worked to modify Glastonbury’s Ordinance to make sure it fit the recommended needs and ideals of what they felt would protect Ledyard from an ethics prospective.

Councilor Buhle went on to note with the exception of the changes that were made to the Ordinance during the Administration Committee’s Special Meeting that was held earlier this evening, that Attorney Ritter had reviewed and approved all of the changes to the newly proposed “*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*”.

Councilor Buhle stated that she did not view a Public Hearing as a “*One and Done Situation*” noting that tonight’s Public Hearing was a great opportunity to receive more feedback and to continue to work to improve the process. She stated this was an opportunity to hear where their residents were finding faults and about their concerns regarding the proposed “*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*” to make sure they were passing an Ordinance that was legal; was defensible in court; did not create liabilities for the town; and would protect the town from unethical behavior in the future. She stated that she looked forward to hearing from their residents this evening.

DRAFT: 10/29/2025

Ordinance # \_\_\_\_\_

AN ORDINANCE ESTABLISHING A  
TOWN OF LEDYARD CODE OF ETHICS AND ETHICS COMMISSION

Be it ordained by the Town Council of the Town of Ledyard:

Section 1. Authority

In accordance with Chapter III of the Town Charter, there is hereby established a Town of Ledyard Code of Ethics and Ethics Commission.

Section 2. Declaration of Policy and Purpose

The trust of the public is essential for government to function effectively. The proper operation of the Town government requires that Town officials, Town employees, and Town consultants be independent, impartial, and responsible to the people; that governmental decision and policies be made in the proper channels of governmental structure; that public office and employment not be used for beneficial and/or financial interest; and that the public has confidence in the integrity of its government.

The purpose of the Town of Ledyard Code of Ethics is to:

- Identify standards of ethical conduct to guide all Town officials, including members of the Board of Education, and all Town and Board of Education officers, employees, and consultants as they conduct their public responsibilities.
- Clarify the role of the Ethics Commission.
- Outline a process that allows Town officials, including members of the Board of Education, and all Town and Board of Education employees, and consultants to seek guidance and advice about ethical issues connected with their public responsibilities, and
- Establish a process that enables citizens to report, and the Ethics Commission to investigate and respond to possible violation of the Code.

### Section 3. Definitions

As used in this ordinance, the following words or phrases shall have the meaning indicated:

1. “Agency” is any board, commission, authority, or committee of the Town, including the Town Council and Board of Education.
2. “Beneficial interest” means any nonfinancial interest or special treatment that is not common to other citizens of the Town.
3. “Business associate” means a person joined together with another person through employment or to achieve a common financial and/or business-related objective.
4. “Business day” means a day other than a Saturday, Sunday, or other day on which the office of the Ledyard Town Clerk is closed to the public for business.
5. “Campaigning” – to be defined by attorney
6. “Complainant” means a person or persons who files a complaint under penalties of false statement against an official, employee, or consultant containing allegation of prohibited activities under the Code of Ethics.
7. “Confidential Information” means information acquired by a Town official, employee, or consultant in the course of and by reason of performing an individual’s official duties and which is not a matter of public record or public knowledge.
8. “Consultant” means any independent contractor or professional person or firm that is by virtue of an award of a public bid or contract engaged by and receives compensation from the Town or Board of Education for the purpose of providing professional, scientific, technical, or other specialized opinion, and is in a position to influence any decision of an agency, official, or employee.
9. “Employee” is any person receiving a salary, wages, or stipend from the Town or Board of Education for services rendered, whether full-time or part-time.
10. “Family” means the spouse, domestic partner, fiancé, fiancée, parents, daughter-in-law, son-in-law, mother-in-law, father-in-law, sister-in-law, brother-in-law, grandparents, great-grandparents, lineal descendants, stepchildren, foster children, siblings, stepsiblings, foster siblings; lineal descendants of siblings, stepsiblings, and foster siblings of an official, employee, or consultant, or his/her spouse or domestic partner.

11. “*Financial Interest*” means any interest that:

- a. has a monetary value of one hundred dollars (\$100.00) or more or generates a financial gain or loss of one hundred dollars (\$100.00) or more in a calendar year;
- b. is not common to the other citizens of the Town. An individual’s financial interests shall include the financial interests of all members of his/her family but shall not include any duly authorized compensation from the town.

12. “*Gift*” is a gift of more than one hundred dollars (\$100.00) in value. A gift includes, but is not limited to, entertainment, food, beverage, travel, and lodging to the extent that the gift value exceeds one hundred dollars (\$100.00) in any one (1) year from the same person, as well as loans that are not commercially reasonable. A gift may also include donations to a third party on behalf of an official, employee, or consultant for which she/he receives some favor, advantage, or consideration.

Gifts do not include:

1. A political contribution that is otherwise reported in accordance with the law.
2. A loan made on terms that are commercially reasonable and not more favorable than loans made in the ordinary course of business.
3. Any gift regardless of value received from: (i) any family member who resides in the same household as the recipient of the gift, or (ii) another family member unless the other family member who makes the gift is interested, directly or indirectly, in a business transaction or pending matter that is within the purview or responsibilities of (a) the recipient of the gift, or (b) another family member residing in the same household as the recipient of the gift.
4. Certificates, plaques, or other ceremonial awards costing less than fifty dollars (\$50.00).
5. A rebate or discount on the price of anything of value made in the ordinary course of business, without regard to that person’s status.
6. Honorary degrees.
7. Costs associated with attending a conference or business meeting and/or registration or entrance fee to attend such conference or business meeting in which the Town official or Town employee participates in his/her official capacity.
8. Any gift provided to a Town Official or Town Employee or to a family member of a Town Official or Town Employee for the celebration of a major life event provided any such gift provided to an individual does not exceed one thousand dollars (\$1,000.00) in value. A major life event shall include, but not be limited to, a ceremony commemorating an individual’s induction into religious adulthood such as a confirmation or bar mitzvah; a wedding; a funeral; the birth or adoption of a child; and retirement from public service or Town employment.

13. “*Inquiry*” means a complaint or allegation of a possible violation of the Code.

14. “*Official*” is any person holding elective or appointive office in the government of the town and shall include, but not limited to, the Town Council, Board of Education, Town commissions and committees, or any other agency.

15. “*Respondent*” means a person who is the subject of a complaint.

#### Section 4. Confidential information

Town officials, employees, or consultants may not disclose or use any information or records that are not available to the public except in the performance of official duties or as required by law or court order.

#### Section 5. Conflict of Interest Provisions

- a. A Town official, employee, or consultant has a conflict of interest when that individual engages in or participates in any contract, transaction, decision, employment, or rendering of service where the Town official, employee, or consultant has a financial or beneficial interest. *Notwithstanding anything contained in this ordinance to the contract, a Town official, employee, or consultant may enter into a contract with the Town if the contract is (i) publicly quoted or bid; or (ii) the Town official, employee, or consultant is not involved in the awarding of the contract. In addition, the provisions of this section shall not apply to any employment contracts in which a Town official, employee, or consultant is hired by the Town or the Board of Education to perform necessary services.*
- b. A financial interest or beneficial interest presents a conflict of interest that is incompatible with the proper discharge of official responsibilities in the public interest if the Town official, employee, or consultant has reason to believe or expect that he/she or any member of his family or business associate will obtain, secure, or advance such interest by reason of his/her actions in performance or nonperformance of his/her official responsibilities.
- c. A Town official, employee, or consultant does not have a financial interest or beneficial interest that is incompatible with the proper discharge of his/her official responsibilities in the public interest if the interest accrues to such individual, his/her family members or business associate(s) as a member of a profession, occupation, or group to no greater extent that it accrues to any other member of the profession, occupation, or group with which he/she is affiliated as set forth in G.S. 7-148h(b).
- d. ~~No Town Official or employee may directly hire a member of his/her family.~~ *Town employee supervision of a member of his/her family may occur in temporary emergency situations, including but not limited to winter storms, tropical storms, and labor shortages.*
- e. Town officials and Town employees shall not use Town owned vehicles, equipment, facilities, materials, or property for personal convenience or profit. Personal convenience or profit refer to those matters that are not related to the individual's official duties. *This section does not apply to Town-owned vehicles issued to emergency responders who are authorized by the Mayor, Fire Chief or Police Chief to take their Town-owned vehicles home, or vehicles issued to employees who are permitted to bring their Town-owned vehicles homes as part of an employment agreement or contract.*
- f. No Town official, employee, or consultant may withhold information or make a dishonest or fraudulent statement with the intent to deceive or to misrepresent material facts in the performance of his or her official duties.

#### Section 6. Consultants

- a. The Code of Ethics shall be incorporated by reference into all contracts entered into by the Town of Ledyard and the Board of Education with a consultant.
- b. Persons or firms who are engaged by and receive compensation from other governmental entities, such as the state or federal government, and who are in a position to influence any decision of an agency, official, or employee shall be guided by the Code.

#### Section 7. Gifts and favors

- a. No Town official, employee, or consultant, or any business associate, or member of his/her family nor any agency, employee organization, or group of employees shall solicit or accept any gift, whether in the form of a service, a loan at a less than a commercially available rate, a material thing, or a promise, from any person or entity who or which is interested directly or indirectly in any business transaction or pending matter that is within the purview of such official, employee, consultant, agency, employee organization, or group of employees. No Town official, employee, or consultant shall accept, or knowingly seek or cause to be given to any member of his/her family, any valuable favor, treatment, consideration, or advantage beyond that which is generally available to the citizens of the Town from any person who, to the knowledge of the official, employee, or consultant, is interested directly or indirectly in any business transaction or pending matter that is within the responsibilities of the official, employee, or consultant. For purposes of this section, a pending matter includes, but is not limited to, any application to an agency, commission, committee, a bid for work to be performed, an application for employment, and any bid for the furnishing of supplies, equipment, or services.
- b. This section shall not apply to any political contribution that is reported as required by law.



#### Section 8. Equal treatment

Without proper authorization, no Town official, employee, or consultant shall accept, seek, grant, or cause to be granted any special consideration, treatment, or advantage to such individual, or his/her family by virtue of his/her position or business association.

#### Section 9. Disclosure and disqualification

- ✓ Any Town official, employee, or consultant who has a conflict of interest, financial interest, or beneficial interest, direct or indirect, in any contract, transaction or decision within the purview of his/her official responsibilities shall disclose that conflict of interest in accordance with section 9(b) through 9(e). Such disclosure shall disqualify the official, employee, or consultant from participation in the matter, transaction, or decision.
- ✓ No Town official, employee, or consultant shall appear on behalf of any private person or party before any agency in connection with any cause, proceeding, application, or other matter in which he/she has financial interest or beneficial interest without first disclosing such interest to the agency, which shall record such disclosure in the record of the agency's proceeding.
- ✓ All Town Councilors, Board of Education members, and the Mayor shall, on or before January 1<sup>st</sup> each year, file with the Town Clerk, on a form to be prepared by the Town Attorney, a statement, under oath, containing the following information:
  1. All real estate located within the Town of Ledyard owned by such elected official or held under lease for a term exceeding five years, excluding, however, his/her principal residence. The foregoing shall also apply to real estate in the Town of Ledyard owned or leased, as aforesaid, by a corporation, trust or partnership in which any such elected official is the legal or equitable holder of at least five (5) percent of the legal or equitable interest in said corporation, trust, or partnership.
  2. The names of any firm, proprietorship, partnership, or corporation of which said elected official is an employee or in which such elected official holds at least a five (5) percent interest, and which firm, proprietorship, partnership, corporation, or limited liability corporation has sold or supplied goods or services in excess of ten thousand dollars (\$10,000.00) per annum to the Town of Ledyard during the two (2) years immediately preceding such official's election to office.
  3. Any income, fees, salary, or wages directly or indirectly, received by such official from the Town of Ledyard during the two (2) years immediate proceeding such official's election to public office.
- ✓ If there is an uncertainty whether a Town official, employee, or consultant has a conflict of interest, financial interest, or beneficial interest that could disqualify that individual from participation in a matter, such individual shall disclose such possible conflict of interest to the following:
  1. For a Town official who is a member of an elective or appointive board, commission, committee, or authority - to the particular chair of the commission or committee of which such official is a member.
  2. For Town employees and officials appointed by the appropriate authorities – the Mayor or Town Council.
  3. For Board of Education employees - to the superintendent of schools
  4. The Town department directors - to [the Mayor](#) or the Town Council.
  5. The superintendent of schools - to the Board of Education.
  6. For a consultant - to the agent executing the contract on behalf of the Town or Board of Education.
- ✓ The appropriate authority to which the disclosure is made shall make an appropriate record of such disclosure and shall recommend to the Town official, employee, or consultant making the report to seek an advisory opinion from the Ethics Commission regarding whether such official, employee, or consultant should abstain from participating in the transaction or decision related to the possible conflict of interest.
- ✓ Any such questions concerning a possible conflict of interest may be referred to the Ethics Commission pursuant to Section 13 for an advisory opinion.

#### Section 10. Incompatible activities

- a. This Code shall not prohibit any current or former Town official, employee, or consultant from appearing before any agency on his/her own behalf. To avoid an actual or perceived conflict, Town officials are strongly discouraged from appearing before the agency on which they are a member or officer, absent extenuating circumstances, unless he/she has received a prior favorable advisory opinion by the Ethics Commission pursuant to Section 14(b) prior to appearing.
- b. Nothing in the Code shall be interpreted to authorize conduct restricted or prohibited by any provision of the Connecticut General Statutes including, but not limited to, G.S. 8-11, 8-21, and 22a-42(c) that restrict conduct of members of municipal zoning and planning authorities and members of Inland, Wetlands and Watercourses commissions.
- c. To avoid even the appearance of impropriety or creation of a situation that would be contrary to the declared policy and purpose of the Code, a Town official shall exercise care when appearing before other agencies and shall disclose whether he/she is appearing in his/her official capacity or as a private citizen.

#### Section 11. Penalty for violation

A failure to comply with the Code shall be considered grounds for censure, reprimand, suspension, demotion, removal, or dismissal of Town officials, employees, and consultants as applicable. The remedies and procedures specified in applicable statutory and Charter provisions, personnel rules, contract grievance rules, or other work rules, policies, and procedures, shall be followed in the enforcement of this section.

#### Section 12. Acknowledgment form

- a. The Town Clerk shall provide a copy of the Code of Ethics to every Town official and employee within sixty (60) days of date that he/she begins his/her duties. Every Town official and employee shall sign and file with the Town Clerk an acknowledgment form indicating his/her awareness of the provisions of this Code. Current Town officials and employees shall acknowledge the Code of Ethics within one-hundred-twenty (120) days of its effective date.
- b. Each consultant shall sign and file with the Town Clerk an acknowledgment form indicating his or her awareness of the provisions of this Code on or before being retained by the Town, Board of Education, or other agency. Current consultants shall acknowledge the Code of Ethics within one-hundred-twenty (120) days of its effective date.
- c. The Mayor and superintendent of schools shall develop a protocol for periodic training of employees concerning the Code of Ethics. The Commission shall develop a protocol for periodic training of officials.
- d. The Town Council shall approve a procedure for monitoring compliance with this section and approve the training protocols specified in subsection (c).

#### Section 13. Ethics Commission

- a. Structure
  1. The Ethics Commission shall be comprised of five (5) regular members and two (2) alternate members. All members of the Ethics Commission shall be electors of the Town
  2. No more than two (2) of the regular members may be affiliated with any one political party. At all times, at least one regular member shall be unaffiliated with any political party. Both alternate members may not be affiliated with the same political party.
  3. Members will not be compensated for their service on the Commission.
  4. Within thirty (30) days of the appointment of the Ethics Commission, an organizational meeting shall be held at which members shall choose a Chairman, Vice-Chairman, and a Secretary

b. Member and alternate member qualifications

- a. Members and alternate members must be residents of the Town of Ledyard.
- b. No member or alternate member shall:
  - a. Be employed by the Town;
  - b. Have been employed by the Town for a period of two years prior to being appointed to the Ethics Commission.
  - c. Hold or seek any Town office.
  - d. Have campaigned for any other person seeking a town office.
  - e. Have held any Town office for a period of two years prior to being appointed to the Ethics Commission.
  - f. Serve as a member of another Town agency.
  - g. Hold office in a political party or political committee.
  - h. Have been found in violation of state, local, or professional code of ethics.

c. Method of appointment: The Town Council shall appoint the Ethics Commission members in the manner provided in the Town Charter. Members of the Ethics Commission shall be appointed by a minimum of (6) affirmative votes of the Town Council.

d. Terms of appointment

1. Members will be appointed for three (3) year terms.
2. If a member is appointed to fill an unexpired term, then that member's term ends at the same time as the term of the person being replaced.
3. In making the original appointments under this ordinance, the Town Council shall designate two (2) regular members to serve for three (3) years, two (2) regular members to serve for two (2) years; one (1) regular member to serve for (1) year; one (1) alternate member to serve for three (3) years and one (1) alternate member to serve for two (2) years. Thereafter, vacancies shall be filled for a three (3) year term.
4. Inaugural members shall be eligible to serve two (2) additional three (3) years term beyond his/her initial appointment. No member may serve more than three (3) terms total.
5. The Town Council may remove members for cause and fill the vacancy in accordance with the Town Charter. Cause for removal shall include, but is not limited to, an unexcused absence from three (3) consecutive meetings. It shall be the responsibility of the Chairman of the Ethics Commission to notify the Town Council when a member has not properly performed his/her duties.

e. Powers and duties

1. The Ethics Commission shall be authorized to consult the Town Attorney or another attorney hired by the Commission if so authorized by the Town Council.
2. The Ethics Commission shall be authorized to request that the Town Attorney provide advisory opinions.
3. The Ethics Commission has the power to render advisory opinions to any Town official, employee, or consultant on whether conduct by that person would constitute a violation of the Code of Ethics. Individuals seeking an advisory opinion should follow the procedures outlined in Section 14 of the Code.
4. The Ethics Commission has the power to examine complaints and to make a determination of probable cause, pursuant to the procedures outlined in Section 14.
5. The Ethics Commission has the power to hold hearings concerning alleged violations of the code, may administer oaths, and may compel attendance of witnesses by subpoena to the extent permitted by law.
6. The Ethics Commission has the power to review the Code of Ethics policies and procedures on an as-needed basis and will make recommendations to the Town Council regarding changes to the Code of Ethics policies and procedures.



7. The Ethics Commission will make advisory opinions available to the public unless doing so would violate the confidentiality provision of this Code of Ethics or is otherwise prohibited by law.
8. The Ethics Commission will protect the personal privacy rights of any individual who is the subject of an inquiry or complaint, except as necessary to investigate and make determinations of probable cause. If there is a finding of no probable cause, the existence of an inquiry or complaint and any records relating to that inquiry or complaint shall remain confidential pursuant to Section 14.
9. The Ethics Commission may take action to increase public awareness of the Code of Ethics.

#### Section 14. Ethics Commission rules of procedure

- (a) These procedures shall be used by the Ethics Commission established in Section 14 hereof, and are designed to guide public officials, officers, employees, consultants, and citizens of the process to be followed if they seek advice or question the conduct of those in or affiliated with town government. Subsection (b), advisory opinions, describes a process for Town officers, officials, employees, or consultants, and other parties doing business with the Town who are seeking advice about their own conduct or the conduct of a Town office or function. Subsection (c), complaints, describes a formal, public procedure for filing complaints. Subsection (d), other communications; miscellaneous, describes the process to be followed by anyone wishing to bring something to the attention of the Ethics Commission, without requesting an advisory opinion or filing a complaint.

#### (b) Advisory opinions

1. Any current, former, or prospective Town of Ledyard employee, official, or consultant may request an advisory opinion from the Ethics Commission as to whether conduct by that person or entity would violate the Code of Ethics. Any current Town official also may request an advisory opinion concerning the activities of any department over which he/she has jurisdiction or board or commission on which he/she serves.
2. Individuals initiating a request for an advisory opinion must do so by completing a form available through the Ledyard Town Clerk's Office or through the Town's website [www.ledyardct.org](http://www.ledyardct.org). The form must contain a statement setting forth the advice requested and the relevant facts known to the individual making the request so that the Ethics Commission can reasonably be expected to understand the nature of the request. The individual making the request must sign ~~it~~ the form.
3. Requests must be addressed in a sealed envelope to the Ethics Commission, c/o The Ledyard Town Clerk, 741 Colonel Ledyard Highway, Ledyard, CT 06339-1511 who will date stamp, but not open, the envelope and forward same promptly to the chair or vice-chair of the Ethics Commission. On the day said request is received by the Town Clerk, the Town Clerk or his/her representative shall notify the chair or vice-chair of the Ethics Commission, or both, of same.
4. The date the request is received by the Town Clerk will mark the official date of receipt for purpose of deadlines for decisions.
5. Proceedings
  - i. The chair will present the request to the Ethics Commission at its next regular meeting or at a special meeting under executive session, except upon the request of the individual that is seeking the advisory opinion regarding whether his/her conduct constitutes a violation of the Code of Ethics, called by the Ethics Commission chair or vice-chair.
  - ii. The Ethics Commission will meet in to review the request. At that time, it may decide to
    - (1) Seek additional information,
    - (2) Create a subcommittee of at least two (2) commission members to make a recommendation for consideration by the full Ethics Commission,
    - (3) Hold an informal hearing to receive comments from the individual who request the advisory opinion and/or from the public,
    - (4) Investigate the relevant facts and issues in order to render the advisory opinion.

## 6. Decisions

- i. Advisory opinions will be made by a majority of the Ethics Commission members voting at a meeting at which a quorum is present.
- ii. The Ethics Commission will issue an advisory opinion as expeditiously as possible but in any event within ninety (90) days from the day it first considers the request. The Ethics Commission may extend the time for a decision for up to an additional thirty (30) days.
- iii. All advisory opinions must be in writing and communicated to the individual making the request.
- iv. The Ethics Commission may decline to render an advisory opinion if (1) the subject matter is not covered by the Code of Ethics, (2) the known facts are incomplete or incorrect, and the omission or misstatements are material to the advisory opinion requested, or (3) other reasonable grounds exist for not taking action. If the Ethics Commission decides to so act, it shall state its reasons.

## 7. Confidentiality

- i. Requests for advisory opinions will be reviewed in executive session except upon the request of the individual that is seeking the advisory opinion regarding whether his/her conduct constitutes a violation of the Code of Ethics.
- ii. Advisory opinions reviewed in open sessions will be made available for public inspection by delivery to the Town Clerk's office.

## c. Complaints

1. A complaint alleging any violation of the Code of Ethics shall be made on a form prescribed by the Ethics Commission available at the Town's website [www.ledyardct.org](http://www.ledyardct.org) or through the Town's Clerk office, and signed under penalty of false statement. The form shall be delivered to the Town Clerk in a sealed envelope who will date stamp, but not open, the envelope and forward same promptly to the chair or vice-chair of the Ethics Commission. On the day said request is received by the Town Clerk, the Town Clerk or his/her representative shall notify the chair or vice-chair of the Commission, or both, and the respondent within five (5) days of receipt of the complaint. The Ethics Commission shall also notify the respondent that it will conduct a probable cause determination and invite the respondent to provide any information the respondent deems relevant to the Ethics Commission's determination of probable cause.

No complaint may be made under the Code of Ethics unless it is filed with the Ethics Commission within three (3) years after the violation alleged in the complaint has been committed.

The Complaint shall include:

- Name of the person accused (respondent).
- Name of the person filing the complaint.
- The specific acts alleged to constitute a violation of the Code of Ethics and when said actions occurred.

### 1. Evaluation and Acknowledgment

- a. Within sixty (60) business days of the receipt of a complaint, the Ethics Commission shall review and determine whether there is probable cause that a violation of the Code of Ethics has occurred. A finding of probable cause means that based on a review of the available information, the Ethics Commission determines that reasonable grounds exist to believe that the respondent engaged in prohibited conduct by the Code of Ethics. If the Ethics Commission does not make a finding of probable cause, the complaint shall be dismissed, and a copy of its decision shall be mailed to both the complainant and the respondent. Unless the Ethics Commission makes a finding of probable cause, a complaint alleging a violation of this Code of Ethics shall be confidential except upon the request of the respondent.

- b. If the Ethics Commission makes a finding of probable cause, which shall require three (3) affirmative votes, it shall so advise both the complainant and the respondent and begin a formal investigation process.

## 2. Hearings

- i. If the Ethics Commission decides that probable cause of a violation of the Code of Ethics exists, it will conduct a public hearing to determine whether or not a violation occurred in accordance with Uniform Administrative Procedure Act (“UAPA”) (See Chapter 54 of the Connecticut General Statutes). At the hearing, the respondent will have the right to be represented by legal counsel, to present evidence and witnesses and compel attendance of witnesses and the production of books, documents, records, and papers, and to examine and cross-examine witnesses and inspect and copy relevant and material records, papers and documents not in such person’s possession. Hearings are not governed by the legal rules of evidence and any information relevant to the matter may be considered. The Ethics Commission will respect the rules of privilege recognized by the law. Not later than ten (10) days before the start of the hearing, the Ethics Commission will provide the respondent with a list of its intended witnesses. The Ethics Commission will make a record of the proceedings.

## 3. Final Decisions

- ii. Decisions by the Ethics Commission that a person is in violation of the Code of Ethics must result from the concurring vote of four (4) of its members.
  - iii. The Ethics Commission must render its decision within sixty (60) days of the closing of the hearing.
  - iv. Such finding and memorandum will be deemed to be the final decision of the Ethics Commission for the purposes of the UAPA. The respondent may appeal to the superior court in accordance with the provisions of Section 4-183 of the Connecticut General Statutes.
  - v. If the Ethics Commission determines that the Code of Ethics was violated, it will provide the respondent, the Mayor, and the Ledyard Town Council with a copy of its findings and memorandum within ten (10) days after its decision. It will also advise the respondent of his/her right to appeal the decision pursuant to Section 4-183 of the Connecticut General Statutes.
  - vi. Penalties for Violations of the Code of Ethics  
Violation of the Code of Ethics may lead to any one or a combination of the following penalties:
    - a. Order to cease and desist the violation
    - b. Pay a civil penalty of up to the maximum amount permitted by State law.
    - c. Censure
    - d. Suspension without pay
    - e. Demotion
    - g. Termination of employment
    - h. Restitution of any benefits received because of the violation committed.

Penalties will be determined by a majority vote of the Town Council within sixty (60) days after receipt of the finding and memorandum of Ethics Commission.
- d. Other communications; miscellaneous:
- The Ethics Commission welcomes communications from the public even if they do not fall within the categories of an advisory opinion, inquiry, or complaint. These should be in writing and should include the name and address of the individual making the communication. The communication should be addressed in a sealed envelope to the chair of the Ethics Commission, c/o the Ledyard Town Clerk, 741 Colonel Ledyard Highway, Ledyard, CT 06339-1511 who will date stamp, but not open, the envelop and forward same promptly to the chair or vice chair of the Ethics Commission. On the day said communication is received by the Town Clerk, the Town Clerk or his/her representative shall notify the chair or vice chair of the Ethics Commission, or both, of same. The chair or vice chair shall determine whether said communication should be treated as confidential. Requests that are not treated as confidential will be made available for public inspection by delivery to the Town Clerk’s office. Communications will be handled on a case-by-case basis and at the discretion of the Ethics Commission.

Section 15. Severability

If any part of this Code of Ethics or Ordinance shall be held by a court of competent jurisdiction to be invalid, such holding shall not be deemed to invalidate the remaining provisions hereof.

Adopted by the Ledyard Town Council on: \_\_\_\_\_

Signed/Certified on: \_\_\_\_\_

\_\_\_\_\_  
Gary St. Vil, Chairman

Approve/Disapprove on: \_\_\_\_\_

\_\_\_\_\_  
Fred B. Allyn , III, Mayor

VI. PUBLIC COMMENT

Chairman St. Vil thanked Councilor Buhle for her prestation regarding the proposed “*An Ordinance Establishing a Town of Ledyard Code of Ethics And Ethics Commission*”. He stated at this time he would open the floor to residents comments; and he asked residents to keep their comments to 3 minutes or less. He also asked that if residents have already submitted written comments to the Town Council, that they not read their written communication, because the Town Council has already received their comments, and to allow time for all those who would like to speak this evening. He stated the written communications were already part of the record, noting that residents were welcome to provide other comments that they have not already been submitted. He also asked for those attending on-line to please put their name and address in the “*Chat*” and they would be called on in the order that they were signed up.

**Mr. Carlo Porazzi**, 30 Chapman Lane, Gales Ferry, thanked the Town Council for the opportunity to speak this evening. He stated that he was pleased with the new draft “*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*” that he found on-line for tonight’s Public Hearing. He addressed Mayor Allyn’s, III, letter dated October 29, 2025 in which he provided the following edits:

(1) Consultants – Mr. Porazzi stated that he disagreed with Mayor Allyn’s comment that Consultants should be excluded in the proposed “*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*”. Mr. Porazzi stated anyone that does business with the town should be required to adhere to the provisions of the Ordinance.

(2) Section 9; subsection (c)

Section 9. “Disclosure and disqualification” subsection ( c ) stated the following

( c ) “*All Town Councilors, Board of Education members, and the Mayor shall, on or before January 1<sup>st</sup> each year, file with the Town Clerk, on a form to be prepared by the Town Attorney, a statement, under oath, containing the following information:*

1. *All real estate located within the Town of Ledyard owned by such elected official or held under lease for a term exceeding five years, excluding, however, his/her principal residence. The foregoing shall also apply to real estate in the Town of Ledyard owned or leased, as aforesaid, by a corporation, trust or partnership in which any such elected official is the legal or equitable holder of at least five (5) percent of the legal or equitable interest in said corporation, trust, or partnership.*
2. *The names of any firm, proprietorship, partnership, or corporation of which said elected official is an employee or in which such elected official holds at least a five (5) percent interest, and which firm, proprietorship, partnership, corporation, or limited liability corporation has sold or supplied goods or services in excess of ten thousand dollars (\$10,000.00) per annum to the Town of Ledyard during the two (2) years immediately preceding such official’s election to office.*
3. *Any income, fees, salary, or wages directly or indirectly, received by such official from the Town of Ledyard during the two (2) years immediate proceeding such official’s election to public office.”*

Mr. Porazzi stated that the Mayor called out a concern regarding the claiming of real estate. Mr. Porazzi stated this language should remain as is; noting that the town was currently in the throws of development permits, suggestions and proposals. Therefore, he stated it was imperative for those involved in local government and for those who do business with their town to disclose any real estate and other business dealings that may impact those decisions.

- (3) Section 12 “*Acknowledgment form*” – Mr. Porazzi stated that he agreed with Mayor Allyn’s comments that there may be a more technological way to handle having every person in the town acknowledge they have received a copy of the Ethics Ordinance.

Mr. Porazzi concluded his comments by thanking everyone involved, both pro and con, in the process to develop the “*An Ordinance Establishing a Town of Ledyard Code of Ethics And Ethics Commission*”.

**Mr. M. Dave Schroeder, Jr.**, 290 Whalehead Road, Gales Ferry, stated he was here tonight to voice his support for the proposed Code of Ethics and Ethics Commission Ordinance. He stated that he wanted to acknowledge and thank the Town Council for the considerable time, effort, and political capital invested in bringing this forward. He stated this kind of work often goes unrecognized, yet it was essential to maintaining public confidence in town government.

Mr. Schroder continued by noting that the Councilors that were most directly involved in drafting the Ethics Ordinance were all recently re-elected by comfortable margins — a strong indication that the public supported both the intent and the outcome of this effort. He stated for this Ethics Ordinance to achieve lasting acceptance and legitimacy, that it was also important that the concerns of the political minority be recognized and addressed; noting that he believed the current process has done so.

Mr. Schroder went on to state that transparency builds trust, and he stated as further reassurance to any remaining doubters, that he has not found anything in the proposed Ethics Ordinance that was not already standard practice in other Connecticut municipalities. He concluded his comments by stating that he submitted a few minor typographical corrections for the Town Council’s consideration as part of the final review. He thanked the Town Council for their service and for the thoughtful work that has gone into this important measure.

**Mr. Gary Schneider**, 101 Inchcliffe Drive, Gales Ferry, stated that he has been in the Public Sector for over 40 years, with many of those years under an Ethics Code. He stated that it was important for everyone to know what the expectations were when conducting Town business. He stated during his years working with an ethics code, that it did not hinder or add to his work from interaction with the public or in recommending the award of multi-million-dollar construction contracts. He stated that every person, whether a new employee; or elected official must be provided with a document that clearly spelled out the acceptable work relationships and conduct. He stated to provide a non-bias forum, that an Ethics Commission was necessary, noting that it would also take the burden off the Town Council until the end.

Mr. Schneider concluded his comments by stating that the proper operation of town government requires that all public officials and town employees be impartial and responsive to the public interest, that public office and employment should not be used for personal gain or advantage. He stated public officials and town employees should not place themselves in positions where their private interests would conflict with their public duty. He stated by enacting a code of ethics that Ledyard would seek to maintain and increase the confidence of their citizens in the integrity and fairness of their government. Thank you,

**Mrs. Karen Parkinson**, 55 Rose Hill Road, Ledyard, stated she wanted to make the following points:

- (1) ***Where is the Code of Ethics?*** – Mrs. Parkinson stated she reviewed a dozen or more town’s Code of Ethics, noting that she could not find a single Code of Ethics. She stated that she was a National Association of Social Workers(NASW) Professional,

noting that she was now retired. However, she stated when she was working in the field that they had a Code of Ethics that she could frame and display on the wall. She stated that maybe Ledyard could write a one page Code of Ethics that their government could abide by and employees could sign, noting that they may be the first town to sort that out.

- (2) **Definition of Family** – means the spouse, domestic partner, fiancé, fiancée, parents, daughter-in-law, son-in-law, mother-in-law, father-in-law, sister-in-law, brother-in-law, grandparents, great-grandparents, lineal descendants, stepchildren, foster children, siblings, stepsiblings, foster siblings; lineal descendants of siblings, stepsiblings, and foster siblings of an official, employee, or consultant, or his/her spouse or domestic partner.

Mrs. Parkinson stated the definition of *Family* as provided in the “*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*” differed from all of the towns that she reviewed. She stated Ledyard’s definition of *Family* was garbled and looked like it was a cut and paste. She stated it included *lineal descendants* of your stepchild or stepsister; or your foster stepchild, noting that it was insane. She asked that this be corrected, noting the number of people this would involve as the Ordinance was currently written.

- (3) **Consultants** - Mrs. Parkinson stated that the Town of East Lyme was like a sister to Ledyard, and she suggested the Town Council review their Ethics Document, noting that they do not include consultants. She stated by Ledyard including Consultants in their Ethics Ordinance that they would lose a lot of people.

- (4) **Declaration of Policy and Purpose** – Mrs. Parkinson stated in looking for the Code of Ethics in the proposed “*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*” that Section 2 “Declaration of Policy and Purpose” was the closest language to a Code of Ethics. She continued by noting the following language in Section 2:

- “*Trust of the public was essential for government to function effectively*” Mrs. Parkinson stated this whole episode that occurred during the past few months does not make her want to Trust the Town Council.
- “*...and the Public has confidence in the integrity of its government*” – Mrs. Parkinson stated that the behavior of all of them questioned the integrity of their government. She stated the residents were present this evening not because they do not trust the Town Council to make the right decisions. She stated that they wanted to trust them, noting that the residents were supposed to be able to trust the Town Council. She stated if the Town Council continued with this kind of behavior that the town was going to lose its integrity. She stated “*Shame on You*” this should not be a partisan effort; noting that a Code of Ethics was for all of them equally. She stated that the Town Council needed to get out of this bipartisan behavior and get to work to establish an Ad Hoc Committee and to make it not partisan.

**Mr. Mike Cherry**, 5 Whippoorwill Drive, Gales Ferry, thanked the Town Council for the new version of the “*An Ordinance Establishing a Town of Ledyard Code of Ethics And Ethics Commission*” draft dated October 29, 2025 “*Clean Copy with Employee & Public Feedback-Track Changes*”. He stated that he reviewed this draft of the document and his comments this evening were based on that draft. He stated that he agreed with Mrs. Parkinson’s question “*Where is the Code of Ethics*”. He went on to note that he also reviewed the Town of Glastonbury’s Ethics Ordinance, stating that Glastonbury included their Code of Ethics in their ordinance. Mr. Cherry suggested the Code of Ethics be taken out of the Ordinance and that they make the Code of Ethics a Policy Statement, something that would be a live document and not be a document that would have to go through the procedure of modifying an ordinance.

Mr. Cherry continued by providing the Town Council with his marked up copy of the draft “*An Ordinance Establishing a Town of Ledyard Code of Ethics And Ethics Commission*” dated October 29, 2025. He stated in proof reading the Ordinance that he also conducted a comparison and contrast to the Glastonbury ordinance, noting that he had some comments that did not add value such as the numbering was bad, and there were other things that needed to be fixed. However, he stated it was indicative of hurrying to get the Ethics Ordinance to a Public Hearing, noting that the document was not proof read by those who wanted the public to view it; which



resulted in the public finding errors instead of the Committee taking the time to fix the errors before the proposed Ordinance was made available to the public.

Mr. Cherry proceeded by providing an overview of his comments as follows:

- Section 2 “Declaration of Policy and Purpose”
  - ✓ Identify ***standards of ethical conduct*** – Mr. Cherry stated there were no “*standards of ethical conduct*” included in the Ordinance.
- Section 3 “*Definitions*”
  - ✓ ***Agency*** – Mr. Cherry stated this definition included the ***Board of Education***; and it continued throughout the Ordinance. He questioned whether Ledyard has included the Board of Education in their discussions of the Ethics Ordinance and whether the Board of Education was willing to sign up to the Ethics Ordinance, noting that if the Board of Education was not willing, it was useless to include them in the Ethics Ordinance. He questioned the Town Council’s authority over the Board of Education, noting that other than the money that the town did not deal with the Board of Education’s personnel, polices, etc.
  - ✓ ***Campaigning***- Mr. Cherry noted that Campaigning was not defined, noting they could not have an Ordinance with a definition that said, “*to be provided*”.
  - ✓ ***Complainant*** – Mr. Cherry noted that this definition included “*prohibited activities under the Code of Ethics*”. He stated without a Code of Ethics what were the “*prohibited activities*”.
  - ✓ ***Financial Interest*** – Mr. Cherry stated the definition of Financial Interest included an (a) and (b) as follows:
    - (a) “*has a monetary value of one hundred dollars (\$100.00) or more or generates a financial gain or loss of one hundred dollars (\$100.00) or more in a calendar year;*
    - (b) *is not common to the other citizens of the Town. An individual’s financial interests shall include the financial interests of all members of his/her family but shall not include any duly authorized compensation from the town.*”

Mr. Cherry stated it was unclear if it was both (a) and (b) or whether it was (a) or (b). He stated this needed to be specified.

- Section 5 “*Conflict of Interest Provision*”;
  - ✓ (d) “*Town employee supervision of a member of his/her family may occur in temporary emergency situations, including but not limited to winter storms, tropical storms, and labor shortages*”.
  - Mr. Cherry suggested the language say: “*Town employee supervision of a member of his/her family **is not allowed; unless it is an emergency situation***” as defined in the remainder of the paragraph.
  - ✓ (f) “*No Town official, employee, or consultant may withhold information or make a dishonest or fraudulent statement with the intent to deceive or to misrepresent material facts in the performance of his or her official duties*”.

Mr. Cherry stated that paragraph (f) was not a Conflict of Interest, yet it was in the Section titled “*Conflict of Interest*”. He stated that this needed to be fixed. He noted the Town of Glastonbury’s Ethics Ordinance listed things that were a “*Code of Ethics Violation*”. However, he stated Ledyard’s draft “*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*” did not include a list Ethics Violations, noting that this goes back to not having a Code of Ethics.

- Section 9. Disclosure and disqualification

- ✓ (d) *If there is an uncertainty whether a Town official, employee, or consultant has a conflict of interest, financial interest, or beneficial interest that could disqualify that individual from participation in a matter, such individual shall disclose such possible conflict of interest to the following:*

(4) *The Town department directors - to the Mayor or the Town Council.*

Mr. Cherry stated the Town Council had no authority over Town Department Directors. He stated “~~Town Council~~” should be struck out.

Mr. Cherry also noted in Section 9; paragraphs (e) and (f) one says “*may*” and the other said “*shall*”. He stated the language should be consistent.

Mr. Cherry continued by noting

- ✓ Paragraph (f) subsection (a) and (b). Mr. Cherry noted the language said “*unless*”. in one subsection and “*nothing*” in the other subsection. He stated this needed to be cleaned up. He suggested the Town Council review CGS 7-148.

- Section 13 “*Ethics Commission*”

- ✓ (b) “*Member and alternate member qualifications*”  
subsection (c) “*Method of appointment: The Town Council shall appoint the Ethics Commission members in the manner provided in the Town Charter. Members of the Ethics Commission shall be appointed by a minimum of (6) affirmative votes of the Town Council*”.

Mr. Cherry noted that the Town of Glastonbury’s Ethics Ordinance called for “(7) affirmative votes of the Town Council”. He stated that Glastonbury’s Town Council was also comprised of nine members, therefore, he stated that it was worthwhile for Ledyard to increase the number 7 *affirmative votes of the Town Council*.

Mr. Cherry stated the numbering needed to be fixed throughout the document. He stated because he has run out of time that he would ask that the Town Council look at:

- Section 14 “*Ethics Commission rules of procedure*”

Subsection 3 “*Final Decisions*”; Subsection vi. *Penalties for Violations of Code of Ethics*”.

- ✓ (h) *Restitution of any benefits received because of the violation committed.*  
*Penalties will be determined by a majority vote of the Town Council within sixty (60) days after receipt of the finding and memorandum of Ethics Commission.*

Mr. Cherry stated the wording that was added under item (h) (see above) look like they were hanging there; and therefore, they needed to be fixed

Mr. Cherry went on to note that the Town of Glastonbury did a good job at sending the “*penalties*” it back to the Town Council, Mayor, Superintendent of Schools and the Board of Education. However, he stated that Ledyard’s proposed “*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*” does not. He stated the Town Council, Mayor, Superintendent of Schools and the Board of Education had the authority to make changes. He stated that Mr. Schroeder previously provided good words “*Report of recommendations to forward*”. Mr. Cherry suggested they use Mr. Schroeder’s recommendations, noting that they were the same words that were in the Town of Glastonbury’s Ethics Ordinance.

Mr. Cherry concluded his remarks by stating that he would have done a word search on the Town of Glastonbury’s Ethics Ordinance to replace ***Glastonbury*** with ***Ledyard*** and to replace ***Town Manager*** with ***Mayor***; noting that it would have been better than what they currently have.

***Mrs. Pamela Ball***, 674 Shewville Road, Ledyard, attending remotely via Zoom, stated that she has written several letters against the formation of an Ethics Commission. She stated that she was not against developing a Code of Ethics. She stated that she sent a letter this morning and she noted that her two main concerns were as follows:

- Section 14 “*Ethics Commission rules of procedure*”
- ✓ Subsection 5 “Proceedings”

- (i) *The chair will present the request to the Ethics Commission at its next regular meeting or at a special meeting under executive session, except upon the request of the individual that is seeking the advisory opinion regarding whether his/her conduct constitutes a violation of the Code of Ethics, called by the Ethics Commission chair or vice-chair.*

Mrs. Ball questioned whether this meant that the Regular Meetings would be open to the public, recorded, and the minutes published. She questioned whether they would be discussing confidential information.

Mrs. Ball noted the final paragraph under Section 14 stated:

***Other communications; miscellaneous:***

***The Ethics Commission welcomes communications from the public even if they do not fall within the categories of an advisory opinion, inquiry, or complaint. These should be in writing and should include the name and address of the individual making the communication. The communication should be addressed in a sealed envelope to the chair of the Ethics Commission, c/o the Ledyard Town Clerk, 741 Colonel Ledyard Highway, Ledyard, CT 06339-1511 who will date stamp, but not open, the envelop and forward same promptly to the chair or vice chair of the Ethics Commission.***

Mrs. Ball questioned whether the language noted above meant that anyone could go the Ethics Commission and make a complaint about anything, any volunteer, any employee, any contractor, etc. She stated this did not seem fair and that it was intrusive in someone’s life.

Mrs. Ball continued by providing some examples as follows:

**Example #1**

A Volunteer and Town Employee go out to dinner, and someone sees the Volunteer pay for the dinner; and files a complaint because they think the Town Employee received a gift. Mrs. Ball questioned who had the authority to ask for the truth; would the accuser ask the restaurant how much the meal was; would they go to the Volunteer and Employee and ask for the receipt; would the Ethics Committee ask to see the receipt. Mrs. Ball went on to state what if the Town Employee paid back their half of the dinner bill to the Volunteer at a later date. She stated that this was a horrible situation to put someone through over something that was quite minor. She stated that they were all neighbors and friends.

**Example #2**

A Volunteer or Town Employee was in the hospital and the other Volunteers or Employees wanted to send them flowers. Mrs. Ball questioned would it matter if the flowers cost \$125.00. Would the person in the hospital have to ask the florist how much the flowers costs and then refuse them if they cost more than \$100.00 or from the wrong person.

**Example #3**

A Volunteer and a Friend go out to eat and the Friend picked-up the tab. Would the Volunteer need to keep track of the amount in case they go out again; and the same friend wanted to pay again.

Mrs. Ball stated who would want to volunteer in a town where they had to watch how much they spend on their friends and how much their friends spend on them. She stated that it was not a place where she would want to volunteer. She stated that she spends hundreds of hours working on the Farmers Market. She noted the Farmers Market Team spends hundreds of hours and per the “*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*” they were going to have to watch if they wanted to do something nice for each other. She stated that she did not think “*Kindness*” was an ethical concern; and it should not have these types limits.

Mrs. Ball concluded her comments by stating that she continued to have concerns regarding the proposed “*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*” noting the following:

- Confidentiality Requirements still had serious flaws.
- How Complaints were handled still had serious flaws.
- Section 7 “*Gifts and favors*” does this mean a gift from anyone.

Mrs. Ball stated in considering what happened to her friend in Bozrah and seeing what happened in Waterford, noting that people’s lives could be ruined over petty things. Thank you.

**Mr. Dan Pealer**, 48 Highland Drive, Ledyard, stated he spent some time over the weekend reading the draft “*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*”. He stated the proposed Ordinance was not entirely clear to for him to determine whether it did not clash with the State preemption when it comes to boards that were a direct result of State Legislation. He noted because he serves as a member of the Inland Wetlands And Watercourses Commission that he would use this as his example; and how it applied. He noted that the Connecticut General Statutes 22A was the authority that helped to establish the Inland Wetlands and Watercourses Commission, and it established certain ethical rules; it included penalties, and other provisions for the Inland Wetland and Watercourses Commissioners. He stated that he had concerns that the application of the Ethics Ordinance, as it existed right now, could potentially conflict with that State Statute and with other similar legislation. He urged that a review be done to make sure that there were no such conflicts present in the proposed Ethics Ordinance. Thank you.

**Mr. Brandon Sabbag**, 16 Nutmeg Drive, Gales Ferry, Congratulated all nine members of the Town Council both those who were reelected and newly elected. He stated that he believed all nine recently elected members of the Town Council, both the Democrats and the Republicans, wanted to have ethics in their town. He stated they have received a lot of public comment, noting that some residents took a lot of time to provide suggestions going line by line in the proposed “*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*”; and to provide examples concerning various scenarios. He stated this was a great moment for the town to unify, and he suggested they take a step back, noting that the Democrats had the majority, he stated instead of pushing this through that they take some time to make this a turning point for Ledyard, where it was not partisan politics, and they all work together. Thank you,

**Mr. Mike Cherry**, 5 Whippoorwill Drive, Gales Ferry, stated after hearing the comments tonight that there were a lot of volunteers that had concerns. He stated that he agreed with Mr. Sabbag in that they had plenty of time, noting that he did not see any reason for the Town Council to try to approve the “*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*” at their November 12, 2025 meeting as posted. He stated that he would be happy to proof read documents. He thanked the Town Council for all the work they do.

**Mrs. Pamela Ball**, 674 Shewville Road, Ledyard, attending remotely via Zoom, suggested the Town Council include volunteers who serve on Commissions that were governed by state statute such as Planning & Zoning Commission, Inland Wetland And Watercourses Commission; where their decisions affect properties in town; and other important activities such as the budget, noting that their input would be helpful in working through the process to develop Ethics for their community. She went on to note that Committees such as the Farmers Market, Beautification Committee, and the Library Commission was not affecting anything in town that would be a conflict. Thank you.

**Mr. Carlo Porazzi**, 30 Chapman Lane, Gales Ferry, asked the Town Council not to wait to approve the “*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*”. He stated that once the Ordinance was in-place that they could amend the document as they all learn. He stated that if the proposed Ordinance gets pushed off, who knows when it would come back. He stated that they have come too far. He thanked everyone for their help.

Chairman St. Vil stated that he appreciated everyone's comments. He stated the he would like to provide members of the Town Council the opportunity to speak.

**Ms. Jessica Buhle**, 65 Pheasant Run Drive, Gales Ferry, Town Councilor, stated her opinion was that she did not anticipate tonight being the last Public Hearing regarding the proposed "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*". She stated that she has since received additional feedback, noting the following:

- Town Clerk Patricia Riley has provided all of her feedback, and Councilor Buhle noted that some of Ms. Riley's feedback was creating some conflicts.
- Director of Human Resources Christine Dias has reviewed the latest draft of the "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*" and indicated that all of her concerns were addressed.

Councilor Buhle stated that because some of the suggestions she has received may create other conflicts, that she would like to work through those and make sure that everyone, at least for the Town Employees, felt comfortable. She stated a lot of the comments and suggestions provided by residents have been exceptional and that she was grateful they had the opportunity to hold this second Public Hearing, and potentially hold a third Public Hearing. She stated hearing the feedback was constructive and that she has taken notes. She stated that she would be working with the Town Attorney to incorporate changes to address the public feedback that would not violate other laws or create liabilities for the town. She stated the Public Hearing process has been an exceptional process, noting that the Administration Committee had been working on the proposed "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*" for well over year. However, she stated the Administration Committee received very little comment until the proposal was presented at the Public Hearing.

**Mr. Tim Ryan**, 62 Inchcliffe Drive, Gales Ferry, Town Councilor, thanked everyone for attending tonight's Public Hearing. He stated that he appreciated hearing the public's input on the proposed "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*"; and hearing their comments on everything the Town Council does as well as on what their subcommittees do. He stated that he appreciated everyone who supports the Code of Ethics as well as those who had some commentary on the subject. He stated that he agreed with some of the concerns that others have expressed. He stated that he has talked with Councilor Buhle regarding some of his more pressing concerns and that he hoped they could work through those. He stated that he agreed with Councilor Buhle in that there was no rush to push the proposed "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*" through, as he has said throughout this process. He stated that he wanted them to take the time to make sure all stakeholders were included in the process. He stated that he would support creating an Ad Hoc Committee that involved volunteers and town employees to make sure their concerns were addressed and their input was incorporated in the document. He stated by involving all, that it would endow them with a stronger, more robust Code of Ethics; as well as an Ordinance that not only protected their employees, volunteers, but that would also protect the integrity of the town.

**Councilor Saccone**, 29 Richard Road, Gales Ferry, stated that his term on the Town Council would be ending in a couple of weeks. However, he stated that it was exciting that so many residents showed up to discuss the proposed "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*". He stated if they could show up for the many other meetings that occur during the year that it would be a great opportunity for the residents, who the Town Council worked for, to tell them what they would like them to do. He stated with the residents input the Town Council could develop an Ordinance, as Councilor Buhle and the Administration Committee has done. He stated when he steps down from the Town Council that he would hold the incoming Town Council to the same Ethical standards that the residents who were present this evening were hold them to; and he thanked the residents for doing that.

**Mr. Gary St. Vil**, 2 Thompson Road, Ledyard, Town Council Chairman, stated that he has spoken to the members of the Town Council on both sides of the aisle as well as Mayor Allyn, III, and he stated that Mrs. Parkinson's message was received. He stated regardless of who had the majority that there was no appetite for bickering; and for not working together. He stated the town has set an expectation for this Town Council to collaborate; and collude for the betterment of the town. He stated this message has been received and that everyone on the Town Council have asked him how they could work together better.

Chairman St. Vil continued by stated that everyone has acknowledged that the proposed “*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*” was important. He stated in speaking with Mayor Allyn, III, today that he stated the new draft of the Ordinance was much better, noting that he did not want to speak for the Mayor. However, he stated that what he was trying to communicate was that the proposed Ethics Ordinance was not a partisan effort. He stated there was a way that they could collaborate on a solution and that they were going to keep it front and center until they come to a decision.

Chairman St. Vil concluded his comments by echoing the other members of the Town Council in that he appreciated the input received from the townspeople; and that they expect to hear more and as they work to collaborate throughout this process. He also stated that he expected the collaboration to not only be amongst the nine members of the Town Council, but that it would also be among them as a community.

## VII. ADJOURNMENT

Chairman St. Vil stated hearing no further public comment, that the Public Hearing was adjourned at 5:42 p.m.

\_\_\_\_\_  
Transcribed by Roxanne M. Maher  
Administrative Assistant to the Town Council

I, Gary St. Vil, Chairman of the Ledyard Town Council,  
hereby certify that the above and foregoing is a true and correct  
copy of the minutes of the Public Hearing held on November 10, 2025

Attest: \_\_\_\_\_  
Gary St. Vil, Chairman